

1 ANDRÉ BIROTTÉ JR.
2 United States Attorney
3 ROBERT E. DUGDALE
4 Assistant United States Attorney
5 Chief, Criminal Division
6 JUDITH A. HEINZ (Cal. Bar No. 176264)
7 DEIRDRE Z. ELIOT (Cal. Bar No. 145007)
8 Assistant United States Attorneys
9 National Security Section
10 1300 United States Courthouse
11 312 North Spring Street
12 Los Angeles, California 90012
13 Telephone: (213) 894-7280/(714) 338-3599
14 Facsimile: (213) 894-6436
15 E-mail: judith.heinz@usdoj.gov
16 deirdre.eliot@usdoj.gov

17 Attorneys for Plaintiff
18 UNITED STATES OF AMERICA

19 UNITED STATES DISTRICT COURT

20 FOR THE CENTRAL DISTRICT OF CALIFORNIA

21 WESTERN DIVISION

22 UNITED STATES OF AMERICA,

23 NO. CR 13-0736-JFW

24 Plaintiff,

25 GOVERNMENT'S RESPONSE TO
DEFENDANT'S OBJECTION TO
GOVERNMENT'S SUPPLEMENTAL NOTICE
OF INTENT TO INVOKE CIPA

v.

26 SINH VINH NGO NGUYEN, aka
27 "Hasan Abu Omar Ghannoum,"

28 Defendant.

29 The government responds briefly to defendant's "Objection to
30 Government's Submission Pursuant to Section 4 of the Classified
31 Information Procedures Act." On October 25, 2013, the government
32 filed, and gave public notice that it filed, a classified, in camera,
33 ex parte filing, titled "Government's Supplemental Notice of Intent
34 to Invoke Classified Information Procedures Act." As the title
35 indicates, as the Court knows, and as the government believes it
36 advised defense counsel, the October 25, 2013 classified filing did
37 not ask the Court to delete any classified information from discovery

1 pursuant to CIPA Section 4. Accordingly, the government believes
2 defendant's "Objection to Government's Submission Pursuant to Section
3 4 of the Classified Information Procedures Act" is moot.

4 Dated: October 30, 2013 Respectfully submitted,

5 ANDRÉ BIROTTÉ JR.
6 United States Attorney

7 ROBERT E. DUGDALE
8 Assistant United States Attorney
Chief, Criminal Division

9 /S/
10 JUDITH A. HEINZ
11 Assistant United States Attorney

12 Attorneys for Plaintiff
13 UNITED STATES OF AMERICA